

REMARKS

Claim 15 was rejected under § 102 over Sota. However, Sota does not teach stacking at least two semiconductor dies having substantially the same rectangular dimensions on top of one another such that one of said dies is mounted on top of the leadframe fingers and the other said dies is mounted on the die mounted on the leadframe fingers.

In contrast in Sota, Figures 3B through 3E, each of the dice 1 is mounted on opposite sides of the leadframe fingers. But of course, neither die is mounted on the other die that in turn is mounted on the leadframe fingers. Thus, reconsideration of the rejection of claim 15, its dependent claims and claim 21 is respectfully requested.

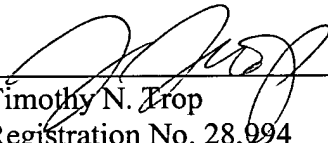
Claim 32 has been amended to include the subject matter of former dependent claim 33. Thus, this amendment should be enterable.

Former dependent claim 33 was rejected over Ball taken by itself. Certainly a § 103 rejection based on a single reference is open to considerable doubt. There simply can be no reason from within the reference itself to teach its own modification. Here no such rationale is provided. The Examiner points out that one skilled in the art would recognize that wirebonding the second die or leadframe when the second die is attached to the first die since the wirebonding of the second die would provide an electrical connection between the second die and the leadframe while increasing the number of signals between the second die and an external device is noted but begs the obviousness question. Nothing in the reference teaches the advantageous nature of wirebonding both dice to the same leadframe finger. Therefore, there is no rationale from within the reference to modify the reference which necessarily does not show what is claimed and therefore necessarily teaches away.

Therefore, the rejection of claim 32 should be reconsidered.

Respectfully submitted,

Date: August 7, 2003



Timothy N. Trop
Registration No. 28,994
TROP, PRUNER & HU, P.C.
8554 Katy Freeway, Suite 100
Houston, Texas 77024
(713) 468-8880 [Phone]
(713) 468-8883 [Fax]